

ZELDES, NEEDLE & COOPER

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW
1000 LAFAYETTE BLVD.
POST OFFICE BOX 1740
BRIDGEPORT, CONNECTICUT 06601-1740

TELEPHONE (203) 333-9441
FAX (203) 333-1489

Jonathan D. Elliot, Esquire
Direct Dial: (203) 332-5727
E-Mail: jelliot@znclaw.com

April 17, 2012

Honorable George B. Daniels
U.S. District Court
Southern District of New York
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Ryan Finnesey v. RJM Acquisitions Funding, LLC
U.S. District Court, Southern District of New York
No. 1:11-cv-06439-GBD

Dear Judge Daniels:

I represent the defendant in the above action.

The matter is in the midst of discovery. The undersigned was attempting to resolve issues relating to deficiencies in the plaintiff's responses to discovery in the hope of avoiding a motion to compel. Defendant has noticed the deposition of the plaintiff for April 26, 2012, and defendant is working on responding to the plaintiff's discovery responses. Discovery was supposed to be completed by May 1, 2012.

On April 4, 2012, however, the plaintiff's counsel moved to withdraw from this action on the ground that they have no ability to communicate with the plaintiff. Accordingly, plaintiff's counsel would appear to have no ability to resolve our discovery disputes or to produce the plaintiff for his deposition. It is unclear whether the plaintiff has any interest whatsoever in the prosecution of this matter.

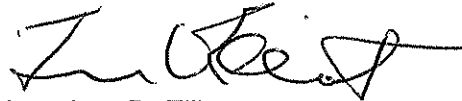
Given plaintiff's counsel's current limitations, I am writing to request that the discovery deadline of May 1, 2012 be held in abeyance, that the plaintiff's deposition be postponed and that defendant be granted reasonable additional time to respond to discovery, not less than two (2) weeks after a resolution of the plaintiff's counsel's motion to withdraw.

April 17, 2012
Page 2

ZELDES, NEEDLE & COOPER
A PROFESSIONAL CORPORATION

This request is the first directed to any of the relevant time period and is made with the consent of the plaintiff's counsel.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jonathan D. Elliot', with a stylized flourish at the end.

Jonathan D. Elliot

JDE/raf

cc: Shireen Hormozdi, Esq. (via facsimile)
Douglas I. Greenberg, Esq. (via facsimile)